IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 12-02447/ESL

ANIBAL MIRANDA PEREZ

IDELISSA MELENDEZ CONCEPCION

CHAPTER 13

DEBTORS

MOTION REQUESTING CONVERSION TO CHAPTER 7

TO THE HONORABLE COURT:

NOW COME, ANIBAL MIRANDA PEREZ and IDELISSA MELENDEZ CONCEPCION, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

- 1. Debtors may be debtors under Chapter 7, 11 U.S.C. §1307(f).
- 2. Debtors may convert a case under Chapter 13 to a case under Chapter 7 of Title 11 at any time, 11 U.S.C. §1307(a).
 - 3. There have been no prior cases and no prior conversions.
- 4. The Schedules and Statement of Financial Affairs have been filed in the case and unless the court otherwise orders it shall be deemed filed in the Chapter 7 case, Rule 1019(1)(A), Federal Rules of Bankruptcy Procedure.

WHEREFORE, the debtors respectfully request that this Honorable Court grant this motion, convert this Chapter 13 case to one under Chapter 7 and enter relief pursuant to Chapter 7 of Title 11, United States Code.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notification to the following: Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; to the United States Trustee's Office;

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and I also certify that I have sent a copy of this motion via regular mail to the debtors, Anibal Miranda Pérez, PO Box 643, Juncos PR 00777 and Idelissa Meléndez Concepción, Manciones de Juncos, 3 Eucalipto Street, Juncos PR 00777; and to all creditors appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this day of November, 2015.

/s/ Roberto Figueroa Carrasquillo ROBERTO FIGUEROA CARRASQUILLO ATTORNEY FOR PETITIONERS PO BOX 186 CAGUAS PR 00726 TEL NO 787-744-7699 FAX 787-746-5294 EMAIL: rfigueroa@rfclawpr.com

Certificamos haber leído esta moción y que la misma fue redactada según nuestras instrucciones. En Caguas, PR a //de noviembre de 2015.

ANIBAL MIRANDA PEREZ

IDELISSA MELENDEZ CONCEPCION

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Label Matrix for local noticing 0104-3 Case 12-02447-ESL13 District of Puerto Rico Old San Juan Thu Nov 5 09:22:24 AST 2015

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